

**VIA ECF**

The Honorable Arun Subramanian  
United States District Court, Southern District of New York  
500 Pearl Street, Courtroom 15A  
New York, NY 10007-1312

**Re: *United States et al. v. Live Nation Entertainment, Inc. et al.*; 1:24-cv-03973-AS-SLC**

Dear Judge Subramanian:

Pursuant to the Court's instruction at the October 29, 2024 conference, Defendants submit this letter to update the Court on the status of discovery.

- Defendants produced over 600,000 documents and over 33 million observations of data to Plaintiffs during their pre-Complaint investigation.<sup>1</sup>
- Defendants' contract reviewers have reviewed approximately 4,000,000 documents for responsiveness to Plaintiffs' document requests since the September 27, 2024 discovery conference, including approximately 400,000 documents since Defendants' last update on January 31, 2024.
- Defendants have produced nearly 990,000 documents and over 26 billion observations of data covering 7 different countries in this litigation to date.

*[signatures on following page]*

---

<sup>1</sup> Defendants previously produced to Plaintiffs approximately 1.7 million documents between 2015 and 2019 in response to Plaintiffs' prior investigations.

Dated: February 14, 2025

Respectfully submitted,

LATHAM & WATKINS LLP



Alfred C. Pfeiffer (admitted *pro hac vice*)  
*Co-Lead Trial Counsel*  
Timothy L. O'Mara (admitted *pro hac vice*)  
Jennifer L. Giordano  
Andrew M. Gass (admitted *pro hac vice*)  
Kelly S. Fayne (admitted *pro hac vice*)  
Lindsey S. Champlin (admitted *pro hac vice*)  
Robin L. Gushman (admitted *pro hac vice*)  
  
505 Montgomery Street, Suite 2000  
San Francisco, CA 94111  
(415) 391-0600

555 11<sup>th</sup> Street, NW, Suite 1000  
Washington, D.C. 20004  
(202) 637-2200

Al.Pfeiffer@lw.com  
Tim.O'Mara@lw.com  
Jennifer.Giordano@lw.com  
Andrew.Gass@lw.com  
Kelly.Fayne@lw.com  
Lindsey.Champlin@lw.com  
Robin.Gushman@lw.com

*Attorneys for Defendants Live Nation  
Entertainment, Inc. and Ticketmaster L.L.C.*

cc: All Counsel of Record (via ECF)

CRAVATH, SWAINE & MOORE LLP



David R. Marriott  
*Co-Lead Trial Counsel*  
Lauren A. Moskowitz  
Jesse M. Weiss  
Nicole M. Peles

Two Manhattan West  
375 Ninth Avenue  
New York, NY 10001  
(212) 474-1000

dmarriott@cravath.com  
lmoskowitz@cravath.com  
jweiss@cravath.com  
npeles@cravath.com

*Attorneys for Defendants Live Nation  
Entertainment, Inc. and Ticketmaster L.L.C.*